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INSTALLATION RESTORATION PROGRAM

NO FURTHER ACTION DECISION DOCUMENT

SITE ST-032

INDUSTRIAL PRETREATMENT FACILITY

**PLATTSBURGH AIR FORCE BASE
PLATTSBURGH, NEW YORK**

PREPARED BY

**380 SPTG/CEV
PLATTSBURGH AIR FORCE BASE
PLATTSBURGH, NEW YORK**

INSTALLATION RESTORATION PROGRAM
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SITE ST-032

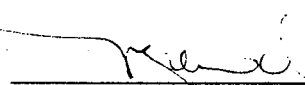
INDUSTRIAL PRETREATMENT FACILITY

CERTIFICATION

1. **Statement of Basis and Purpose:** This decision document states the basis for Plattsburgh Air Force Base's (AFB) decision to end all additional remedial actions, including investigations, at ST-032, the Industrial Pretreatment Facility. At this site, a Preliminary Assessment was conducted on 23 Jan 92 pursuant to Federal Facilities Agreement, Document Number II-CERCLA-FFA-10201, Section IX, paragraph B. Plattsburgh AFB entered into this Federal Facilities Agreement with the United States Environmental Protection Agency (USEPA) and the New York State Department of Environmental Conservation (NYSDEC) on 10 Jul 91. This no-further-action decision was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), and Section 300.430 of the National Contingency Plan (NCP).

2. **Site Status:** At this site, Plattsburgh Air Force Base conducted a removal action in Nov 92. Plattsburgh Air Force Base discharged 30,000 gallons of water that contained 63 parts per billion of lead to a municipal waste water treatment facility and filled in the 30,000-gallon storage tank with concrete.

3. **Justification:** The lead agency, Plattsburgh AFB, has determined that there is no threat to the environment or human health since no hazardous substances are found at this site. Plattsburgh AFB has determined that this action is consistent with Section 300.430 of the NCP since no hazardous substances remain on site that will present any additional risk to public health or the environment.



MONTE R. LEWIS, Colonel, USAF
Acting Chairman, Environmental
Protection Committee

21 JAN 1993

Date

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2. **Site Description:**

a. **Influent Sources:** The Industrial Pretreatment Facility received waste waters from two sources: a nose dock where airplanes were painted and a washrack where the outsides of airplanes were washed. On 23 Jan 92, Plattsburgh AFB conducted a site visit for a preliminary assessment report which was submitted to the USEPA and the NYSDEC in draft form in Jul 92. At the time of the site visit, there was a belowground tank beneath the facility that contained a liquid. It was believed possible that this tank could still contain waste water waiting for treatment.

b. **Facility Description:** This facility from 1969 until 1980 treated waste water from Nose Dock 8 and a former airplane washrack. The waste water from Nose Dock 8 could have contained paint, paint strippers, solvents, oil, and fuels at any given time. Nose Dock 8, at the time of operation of the Industrial Pretreatment Facility, was the location of the airplane painting operation. The waste water from the washrack contained soaps and rinse waters and other debris (i.e., loose paint chips from washing the outside of airplanes). The tank of concern was part of the structure of the Industrial Pretreatment Facility and measured 14.5 X 9 X 30 feet. The tank was formed out of the basement of the facility. This tank contained 30,000 gallons of water that contained small amounts of lead. The Industrial Pretreatment Facility is located near the Alert Area at Plattsburgh AFB.

3. **Site History:**

a. **Site Identification:** In early Jan 92, Plattsburgh AFB's noncommissioned officer in charge of the Water and Waste Section notified the Environmental Management Flight of a potential environmental problem because of an abandoned tank at the Industrial Pretreatment Facility. He was concerned since this tank appeared to be very large and contained an unknown liquid. Subsequent to this notification, the Plattsburgh AFB Environmental Management Flight conducted a site visit for a preliminary assessment, which was required by the FFA, Section IX, paragraph B.

b. **Records Search:** According to a 1985 records search, the treatment system installed at the Industrial Pretreatment Facility was designed to remove oils, grease, and fuel residues, as well as aircraft cleaning compound residues from waste water received from Nose Dock 8 and the washrack. Nose

Dock 8 was the location of the corrosion control facility. Corrosion control included the cleaning, stripping, sanding, and repainting of the aircraft.

c. Preliminary Assessment:

(1) **Site Visit:** On 23 Jan 92, a site visit was conducted for a Preliminary Assessment Report at this site. During this visit, the manholes leading into the tank were open. The liquid surface was approximately two feet beneath these openings. The roof of the tank was actually the floor of the Industrial Pretreatment Facility, and at the time of the preliminary assessment site visit, this facility contained two small mixing tanks and a skimmer tank used to treat the influent.

(2) **Interview:** On 3 Feb 92, a former facility operator who worked at the facility from 1969 to 1979 was interviewed. According to this operator, the facility received industrial waste water from Nose Dock 8 for treatment. Nose Dock 8 was the location of the aircraft painting facility. The facility added lime and ash to the water for deflocculation, and the treated water was sent to the municipal waste water treatment system. This former facility operator said that when he left his job in 1979, this facility was still operating, and when he returned in 1981, it was closed.

d. Notification: In a 27 Apr 92 letter and 13 Apr 92 Regulatory Progress Meeting, Plattsburgh AFB informed the USEPA and NYSDEC that a removal action will be conducted at site ST-032.

e. Sampling Investigation: On 28 Apr 92, the Plattsburgh Air Force Base Environmental Management Flight sampled the contents of the tank for heavy metals and volatile organic compounds. The results came back negative for all parameters except for lead. Lead was found in an unfiltered water sample at a concentration of 63 parts per billion (ppb). It was believed by the Environmental Management Flight that this lead was from lead-based paint used to coat the sides of the tank.

f. Action Memorandum: On 15 Oct 92, Plattsburgh Air Force Base submitted an action memorandum to the USEPA and NYSDEC pursuant to Section X, paragraph D of the FFA. This action memorandum stated the basis for Plattsburgh AFB to conduct a time-critical removal action at this site. The removal action described in the action memorandum required Plattsburgh AFB to properly dispose of the tank contents and triple rinse the tank.

g. Removal Action: In Nov 92, a Plattsburgh AFB contractor conducted the removal work at this site. The tank contents and rinseates from cleaning the sides of the tank were discharged to a municipal waste water treatment facility, and the tank was filled in with concrete. Permission for discharging the waste water to the municipal waste water treatment facility was granted to Plattsburgh AFB in a 21 May 92 letter (Appendix A).

h. Final Inspection: On 19 Nov 92, the Plattsburgh AFB project engineer inspected the facility to insure the work was completed satisfactorily by the contractor. In an 11 Dec 92 letter, the project

engineer notified the Installation Restoration Program that the work was completed (Appendix B).

4. Site Status:

a. National Priorities List and Federal Facilities Agreement:

Plattsburgh AFB was proposed for the National Priorities List (NPL) on 14 Jul 89 and was promulgated on 21 Nov 89. On 10 Jul 91, Plattsburgh AFB entered a Federal Facilities Agreement (FFA) with the USEPA and NYSDEC pursuant to Section 120(e)(1) and (2) of CERCLA; 42 U.S.C., Section 9620(e)(2), Sections 3004(u) and (v), 3008(h) and 6001 of RCRA; 42 U.S.C. Sections 6924(u) and (v), 6928(h) and 6961, Executive Order 12589; the National Environmental Policy Act, 42 U.S.C. Section 4321; and the Defense Environmental Restoration Program (DERP), 10 U.S.C., Section 2701.

b. Federal Facilities Agreement Purpose: The purpose of the FFA is to ensure that environmental impacts on public health, welfare, and environment associated with past and present activities at Plattsburgh AFB are thoroughly investigated and appropriate remedial or removal actions are taken as necessary to protect public health, welfare, and the environment.

5. Justification: The lead agency, Plattsburgh AFB, has determined that there is no threat to the environment or human health since no hazardous substances are found at this site. Plattsburgh AFB has determined that this action is consistent with Section 300.430 of the NCP since no hazardous substances remain on site that will present any additional risk to public health or the environment.

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APPENDICES

1. Appendix A - 21 May 92 Letter
2. Appendix B - 11 Dec 92 Letter

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PLATTSBURGH AIR FORCE BASE
PLATTSBURGH, NEW YORK

Appendix A
(21 May 92 Ltr)



Plattsburgh, New York

David M. Powell
Chief Plant Operator

Water Pollution Control Plant
Green Street
Plattsburgh, New York 12901
518-563-7172

May 21, 1992

Plattsburgh Air Force Base
380 SPTG/DEEV
Plattsburgh AFB, NY 12903-5000

ATTN: Mr. Brady Baker

RE: DISCHARGE FROM 28,000 GALLON TANK

Dear Mr. Baker:

I received your fax on your proposed discharge of 28,000 gallons of water that you mentioned in our phone conversation on 5/19/92. The lab results showed no contamination as you had indicated, except for the lead result which was just slightly above the PQL. This result does not pose any harm to our system and you have our permission to discharge into the collection system on base.

Since we average close to 8 million gallons per day of inflow, there would not be any restriction on your flow rate other than what your sewer line can handle. If you wanted to pump this out in one day, that would be acceptable, any time longer would not be any problem. When do you anticipate doing this work? Please let me know on. Other than that, I can see no other restrictions on your discharging the contents of the tank to the sanitary sewer.

If you have any further comments or questions, please feel free to get in touch with me. Thank you.

Very truly yours,

David M. Powell

David M. Powell
Chief Plant Operator

DMP:bl

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**Appendix B
(11 Dec 92 Ltr)**

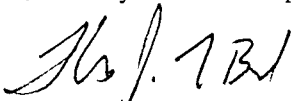
FROM: CECCM

11 Dec 92

SUBJECT: THWA 92-5003, Contract F30636-92-C0239, SS-032 Industrial Treatment
Tank Closure

TO: CEV (Pete Kho)

1. As requested, this letter is to inform you that the subject project is complete and acceptable. The final inspection was conducted on 19 Nov 92 and no punchlist items were found.
2. As of this date, we are still awaiting the contractor, JO-JA Construction Company, from Albany NY, to submit his final invoice for payment, but all construction items are complete and all required submittals have been received.
3. Any further questions can be directed to Steve Gagnier, ext 5697.



THOMAS J. LABOMBARD, PE
Chief, Contracts

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